

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.  
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF  
VITO GELARDI**

VITO GELARDI, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746:

1. I am a defendant in the above-captioned matter, and I am fully familiar with the facts set forth herein. I make this declaration in opposition to the application for monetary sanctions arising out of Defendants' failure to pay attorneys' fees and costs awarded by Court Order.

2. Defendants have not paid the attorneys' fee award because we are financially unable to do so. As this Court knows, our New York business was essentially shut down by Court Order, which deprived us of a stream of income and forced us to re-located to Texas. We are barely scraping by financially, and are currently unable to pay our attorneys and the court-appointed forensic examiner.

3. The Court has been supplied with financial records demonstrating our insolvency in connection with our inability to pay the forensic examiner, and our financial situation

has not improved since that time. We have been unable to sell properties we need to sell in order to make necessary payments, and we are not earning enough money to pay our outstanding debts.

4. This lawsuit has ruined us financially. As a result, we are financially unable to pay the attorney fee award.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 18, 2024.

  
Vito Gelardi